

The Honorable John H. Chun  
United States District Court Judge

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

Bianey GARCIA PEREZ, Maria  
MARTINEZ CASTRO, J.M.Z., Alexander  
MARTINEZ HERNANDEZ, on behalf of  
themselves as individuals and on behalf of  
others similarly situated,

Plaintiffs,

v.

U.S. CITIZENSHIP AND IMMIGRATION  
SERVICES; Ur JADDOU, Director, U.S.  
Citizenship and Immigration Services;  
EXECUTIVE OFFICE FOR  
IMMIGRATION REVIEW; David NEAL,  
Director, Executive Office for Immigration  
Review,

Defendants.

Case No. 2:22-cv-00806-JHC

**JOINT STATUS REPORT &  
STIPULATION**

Note on Calendar: November 27,  
2023

**PARTIES' JOINT STATUS REPORT AND STIPULATION**

Plaintiffs Bianey Garcia Perez; Maria Martinez Castro; J.M.Z.; Alexander Martinez Hernandez; and Defendants U.S. Citizenship and Immigration Services ("USCIS"); Ur Jaddou, Director, USCIS; Executive Office for Immigration Review ("EOIR"); and David L. Neal, Director, EOIR, hereby stipulate to an additional 45-day stay of proceedings as the parties continue to draft a settlement agreement. On May 24, 2023, the parties reached an agreement in principle as to all claims and parties and are working toward finalizing the terms of the settlement agreement.

Plaintiffs and Defendants have previously jointly stipulated to several stays. *See* ECF Nos. 34, 37, 39, 41, 44, 46, 48, 51, 53, 56. Most recently, the parties jointly stipulated to a stay on October 13, 2023. ECF No. 55. On October 19, 2023, this Court granted the parties' stay and ordered the parties to submit a joint status report on November 27, 2023. ECF No. 56. Since that order, the parties have continued to make progress on finalizing a settlement agreement and Defendants will endeavor to provide any edits or feedback on the draft settlement agreement to Plaintiffs by December 8, 2023. Further, Plaintiffs have proffered a fee request under the Equal Access to Justice Act ("EAJA"), 28 U.S.C. § 2412. Defendants are reviewing Plaintiffs' EAJA fee request and will endeavor to provide Plaintiffs with a response to their fee request by December 8, 2023.

In light of these developments, the parties have agreed to stipulate to a 45-day stay of Defendants' briefing deadlines. Good cause continues to exist for the stipulation because the complexity of the issues in this case requires additional time and there continues to be a meaningful opportunity to reach a settlement that would conserve judicial resources, as well as those of the parties. The parties will file a final settlement agreement with the Court or seek a further extension, if necessary, by January 11, 2024.

**IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

For the Plaintiffs:

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Matt Adams

/s/ Aaron Korthuis

Aaron Korthuis

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Dated this 27th day of November, 2023.

STIPULATION - 3  
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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated this 29th day of November, 2023



The Honorable John H. Chun  
UNITED STATES DISTRICT JUDGE